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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MAURICIO JASSO, individually and in his
capacity as the Court-Appointed Receiver of
JAMA INVESTMENT GROUP, INC.,
GUILLERMO SESMA, SYLVIA MARTINEZ
SALINAS, BELISARIO JASSO BALDINI,
JAVIER RAMIREZ LARES, ANTONIO
BACHALANI, RODRIGO FERNANDEZ,
JUAN ROMERO, and BERNARDO
VILLACECIAS,

Plaintiffs,

v.

WELLS FARGO BANK, N.A., KATHERINE
DARRALL, and JOSE RICO,

Defendants.

Case No. 2:20-cv-00858-CDS-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF WELLS
FARGO BANK, N.A.'S MOTION FOR
PROTECTION REGARDING RULE
30(B)(6) DEPOSITION [ECF NO. 253]**

[FIRST REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs and Defendant Wells Fargo Bank, N.A. ("Wells Fargo" or the "Bank"), for good cause shown, hereby stipulate and agree to extend the deadline for Wells Fargo to file its Reply in Support of its Motion for Protection Regarding Rule 30(b)(6) Deposition [ECF No. 253], filed July 13, 2022 (the "Motion for Protection"), from Monday, August 15, 2022 to Friday, August 19, 2022, for the following reasons:

- 1 1. On Wednesday, July 13, 2022, Wells Fargo filed the Motion for Protection.
- 2 2. Following a Stipulation and Order to Extend Plaintiffs' Response deadline [ECF
- 3 No. 260], Plaintiffs filed their Response in Opposition to the Motion for Protection on Monday,
- 4 August 8, 2022 [ECF No. 268].
- 5 3. Accordingly, Wells Fargo's Reply in Support of the Motion for Protection (the
- 6 "Reply") is due Monday, August 15, 2022.
- 7 4. Wells Fargo's counsel has been diligently working on the Reply, but they require a
- 8 brief four-day extension, up to and including Friday, August 19, 2022, to accommodate conflicting
- 9 professional obligations within the allotted week to respond.
- 10 5. No prejudice will result due to this four-day extension, and the extension will not
- 11 interfere with the hearing on the Motion for Protection, which is currently set for Thursday,
- 12 September 1, 2022.
- 13 6. This extension request is sought in good faith and is not made for the purpose of
- 14 delay.
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THEREFORE, for good cause shown, the Parties respectfully request an extension for Wells Fargo to file its Reply in Support of its Motion for Protection Regarding Rule 30(B)(6) Deposition [ECF No. 253] from August 15, 2022 through and including August 19, 2022.

DATED this 12th day of August, 2022.

SNELL & WILMER L.L.P.

AXS LAW GROUP, PLLC

s/ Hayley J. Cummings

s/ Courtney Caprio (with permission)

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: August 15, 2022

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2022, I electronically transmitted the **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF WELLS FARGO BANK, N.A.'S MOTION FOR PROTECTION REGARDING RULE 30(B)(6) DEPOSITION [ECF NO. 253] [FIRST REQUEST]** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system for filing. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

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